

In re:

John Thomas Moore, Jr.,

Case No. 23-10084-AMC

Chapter 13

Debtor.

Debtors' Motion to Modify Chapter 13 Plan

AND NOW, Debtor John Thomas Moore, Jr., by and through his attorney, moves this Court for approval of a modified chapter 13 plan. In support of this motion, the Debtor states as follows:

1. The Debtor filed this case under chapter 13 on January 12, 2023.
2. The trustee in this case is Scott F. Waterman.
3. The plan was confirmed on November 8, 2023.
4. The Trustee recently filed a motion to dismiss this case for failure to make plan payments.
5. The Debtor wants to amend his plan to resolve the dismissal motion.
6. The proposed plan cures the arrearage that gave rise to the dismissal motion by increasing the Debtor's monthly plan payments moving forward.
7. The Debtor requests that the Court enter an order approving the plan filed at ECF No. 71 as the new confirmed plan.

NOW, THEREFORE, the Debtor asks this Court to approve the modified plan and to grant such other relief in his favor as may be necessary and proper under the law.

Date: March 12, 2025

CIBIK LAW, P.C.
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